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July 25, 2025

**VIA ECF**

Honorable Sarah L. Cave  
United States District Court  
Eastern District of New York  
500 Pearl St.  
New York, NY 10007

Re: *Marin v. 310 Bowery Group LLC*;  
*S.D.N.Y No.: 1:24-cv-01340-(SLC)*

Dear Judge Cave:

This office represents the Defendants. We do not want to burden the Court but there is something that we think is worth clarifying.

Plaintiff thinks that Defendants want them to disclose all of the communications that “class members had with class members.” That is not correct. We believe the Court ordered Plaintiff to disclose information about the communications the Named Plaintiff and six Opt-in Plaintiffs had with Class Members.

It is not hard for Plaintiff’s counsel to reach out to these seven individuals to obtain the information described in the Courts order. That is all that Defendants respectfully request. After all, opposing counsel already admits that he spoke with at least some of these individuals previously to encourage them to try to get absent class members to file claim forms.

We see no reason to respond to the rest of opposing counsel’s letter as those arguments should be contained in our future submission.

We thank the Court for its continued courtesies.

Respectfully submitted,  
Kaufman Dolowich LLC



Aaron N. Solomon

cc: All counsel of record (via ECF)